

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Raul Castillo, individually and on behalf )  
of all others similarly situated, )

Plaintiff, )

v. )

RGS Financial, Inc., a Texas )  
corporation, )

Defendant. )

No. 13 C 5738

Judge Kendall  
Magistrate Judge Cole

**MOTION TO AWARD ATTORNEYS' FEES AND COSTS**

Class Counsel hereby submits this motion, pursuant to F.R.C.P. Rules 23(h) and 54(d)(2), to award attorneys' fees and costs for the litigation of this matter. In support of this motion, Class Counsel states:

1. The Class Action Complaint in this matter was filed on August 12, 2013.
2. The Settlement Agreement, dated November 1, 2013, provided that the Defendant is to pay Class Counsel's attorneys' fees and costs in the amount of \$18,000, as well as \$2,000 for the cost of class notice/claims administration.
3. Attached as Exhibit A is the Declaration of Class Counsel, which shows that they will have incurred \$26,007.49, in fees and costs in prosecuting this matter on behalf of Plaintiff and the Class. Philipps & Philipps, Ltd.'s contemporaneous time and expense records for the work in this matter are attached to the Declaration as Exhibit 1.
4. Accordingly, Class Counsel requests that their hours and hourly rates be approved (\$525 for David J. Philipps, \$515 for Mary E. Philipps, \$230 for Angie K. Robertson, and \$175 for their paralegals), that Defendant's agreement to pay \$18,000 to resolve the attorneys' fees and costs in this matter, plus \$2,000 for the cost of class

notice/claims administration, and that Class Counsel be awarded same, pursuant to their detailed statement of their qualifications and their time and expense records, for their fees and costs.

WHEREFORE, Class Counsel hereby requests that this Court award them \$20,000 for their attorneys' fees and costs and the cost of class notice/claims administration.

Respectfully submitted,

By: /s/ David J. Philipps  
Class Counsel

Dated: February 27, 2014

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 27, 2014, a copy of the foregoing **Motion To Award Attorneys' Fees and Costs** was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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